

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X Case No. 07 CV 6013 (DLC)  
U2 HOME ENTERTAINMENT, INC.,

Plaintiff,  
- against -

WEI PING YUAN a/k/a WEI PING YUEN,  
HUNG MUI YUEN a/k/a HUNG MUI YUAN,  
YEE MUI LEE, SHUEMAN WONG, SHUEYIN  
WONG, CHUN HIU LAM, CHI TING CHANG,  
MORTGAGE ELECTRONIC REGISTRATION  
SYSTEMS, INC. and THE HEMISPHERE NATIONAL  
BANK n/k/a REPUBLIC FEDERAL BANK,

Defendants.

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**ANSWER OF DEFENDANT WEI PING YUAN**

SIR/MADAM:

PLEASE TAKE NOTICE that Defendants HUNG MUI YUAN and  
YEE MUI LEE, by their counsel Goldberg & Cohn, LLP, by Steven D.  
Cohn, Esq., in answering the Complaint of Plaintiff, alleges as follows:

1. Deny knowledge and information sufficient to form a belief as to the  
truth or falsity of the allegations in Paragraph 1.
2. Deny knowledge and information sufficient to form a belief as to the  
truth or falsity of the allegations in Paragraph 2.
3. Deny knowledge and information sufficient to form a belief as to the  
truth or falsity of the allegations in Paragraph 3.
4. Deny knowledge and information sufficient to form a belief as to the

truth or falsity of the allegations in Paragraph 4.

5. Deny knowledge and information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 5.
6. Admit the allegations in Paragraph 6.
7. Admit the allegations in Paragraph 7.
8. Deny knowledge and information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 8.
9. Deny knowledge and information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 9.
10. Deny knowledge and information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 10.
11. Deny knowledge and information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 11.
12. Deny knowledge and information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 12.
13. Deny knowledge and information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 13.
14. Deny knowledge and information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 14.
15. Deny knowledge and information sufficient to form a belief as to the

truth or falsity of the allegations in Paragraph 15.

16. Deny knowledge and information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 16.

17. Deny knowledge and information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 17.

18. Deny the allegations in Paragraph 18.

19. Admit the allegations in Paragraph 19.

20. Deny knowledge and information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 20.

21. Deny knowledge and information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 21.

22. Deny knowledge and information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 22.

23. Deny knowledge and information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 23.

24. Defendants repeat and reallege the responses for Paragraphs one (1) through twenty-three (23) as set forth herein.

25. Deny knowledge and information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 25.

26. Deny knowledge and information sufficient to form a belief as to the

truth or falsity of the allegations in Paragraph 26.

27. Deny knowledge and information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 27.

28. Deny the allegations in Paragraph 28.

29. Deny the allegations in Paragraph 29.

30. Defendants repeat and reallege the responses for Paragraphs one (1) through twenty-nine (29) as set forth herein.

31. Deny the allegations in Paragraph 31.

32. Deny the allegations in Paragraph 32.

33. Deny the allegations in Paragraph 33.

34. Defendants repeat and reallege the responses for Paragraphs one (1) through thirty-four (34) as set forth herein.

35. Deny the allegations in Paragraph 35.

36. Deny the allegations in Paragraph 36.

37. Deny the allegations in Paragraph 37.

38. Defendants repeat and reallege the responses for Paragraphs one (1) through thirty-seven (37) as set forth herein.

39. Deny the allegations in Paragraph 39.

40. Deny the allegations in Paragraph 40.

41. Deny the allegations in Paragraph 41.

42. Defendants repeat and reallege the responses for Paragraphs one (1) through forty-two (42) as set forth herein.
43. Deny knowledge and information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 43.
44. Deny the allegations in Paragraph 44.
45. Deny knowledge and information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 45.
46. Deny the allegations in Paragraph 46.
47. Defendants repeat and reallege the responses for Paragraphs one (1) through forty-six (46) as set forth herein.
48. Deny knowledge and information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 48.
49. Deny knowledge and information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 49.
50. Deny knowledge and information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 50.
51. Deny knowledge and information sufficient to form a belief as to the truth or falsity of the allegations in Paragraph 51.
52. Deny the allegations in Paragraph 52.

**AS AND FOR A FIRST AFFIRMATIVE DEFENSE**

53. The Complaint fails to state a cause of action for which relief can be granted.

**AS AND FOR A SECOND AFFIRMATIVE DEFENSE**

54. Plaintiff's claims are barred by reason of its failure to plead the acts or omissions with particularity.

**WHEREFORE**, Defendants Hung Mui Yuen & Yee Mui Lee demands judgment as follows:

- a) Dismissing the Complaint of Plaintiff as against Defendants Hung Mui Yuen & Yee Mui Lee, and
- b) Granting Defendants Hung Mui Yuen & Yee Mui Lee the costs and disbursements of this action, and
- c) Granting such other and further relief as this Court deems just and proper.

Dated: Brooklyn, New York  
September 11, 2007

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/s/  
Steven D. Cohn, Esq. (SC-3855)  
Goldberg & Cohn, LLP  
Attorney for Defendants  
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